as Department of Health and Environment Bureau of Waste Management Forbes Field, Topeka, Kansas 66620

Hazardous Waste Generator/Transporter Compliance Inspection Report

General			
	Т	ime <u>A.M.</u>	Date <u>January 5, 1995</u>
Facility Name Ashland Chemi	cal Company	EPA II	D No. <u>KSD000203638</u>
Street 3155 Fiberglass I	Road C	ty Kansas City	, KS Zip <u>66115</u>
Mailing Address (if different than	above)		
CountyWyandotte	P	hone (913) 62	1-2410
Contact(s) William Dame (Plant Manager)		
Inspector(s) Jim Fischer			
Type of Business Formulator of	water treatment chemica	ls	
If yes, explain. Industrial Wastes G	enerated		RCRA REGODA
(List hazardous waste first)			RCRA RECORDS CENTER
Waste:	Various off spec/c		Various QA/QC Lab wastes
If waste is hazardous, give HW ID Number:	Potential D001-D00 U070-U113-U044-U18	The transfer of the contract of	Potential F002-D001-D002
Amount generated per month:	Varies		Varies
Amount presently in storage:	22 30 gal.drums of Hypochlorite)	(Sodium	None
Accumulation time:	Less that 90 days		
Present disposal method:	Heritage Environme Service	ntal	Heritage Environmental Service

Kansas City, MO

Kansas City, MO

	()	Т				
Wasie: . 4	,					
If waste is hazardous, give HW ID Number:						
Amount generated per mo	nth:			antige distribution and a second		·
Amount presently in storag	ge:					
Accumulation time:						
Present disposal method:						
General Requ	irements (GGF	3)				
•	ated all potentially hazardo		f it is hazardous?	Yes	No	
	ested, was the analysis cor (3)(A))	ducted by a laboratory ce	rtified by KDHE?	Yes	No	NA
B. If waste(s) was to	ested, are the results kept f	or three years? (KAR 28-3	1-4(f)(1)(C))?	Yes	No	NA
II. If hazardous waste(s) Works (POTW), has v 28-31-3/40 CFR 261.4) is disposed of via the san written permission been ob	itary sewer to a Publicly O stained from the operator of	wned Treatment of the POTW? (KAR	Yes	No	NA
26-31-3/40 OFR 201.	")			Yes	No	NA
been obtained? (KAF		ed sanitary landfill, has a d	isposal authorization	Yes	No	(NA)
	thorization number(s):					
IV. Facility size classification Not a Generator /S/D Facility		HW Burner/Mar	keter Used oil Bu			
	rmination Requirements:		☐ Inadequate			
Notification R	equirements ((GGR)				
V. Has generator notifie	ed KDHE and obtained an	EPA Identification Number	? (KAR 28-31-4(c))	Yes	No	NA
VI. Is current notification	n accurate? (KAR 28-31-4(c	c)(1))		Yes	No	NA
	arketing (selling) hazardous			Yes	No	(NA)
	arketing (selling) used oil as		ndore Charldist \	Yes	No	NA
	uestion A or B, complete U		inders Checklist.)	Yes	No	NA
	rning hazardous waste as a rning used oil as a fuel?	a luei!		Yes	No	NA NA
Notification Requireme	ents:	Adequate	☐ Inadequate			NA
		/ \				

(If small quantity generator, stop here.)

	Do ow Ha	AR 28-31-4(d)(4)(A-C)) es generator retain copy of manifest(s) signed an mer/operator for three years? (KAR 28-31-4(f)(1)(A) as generator ever failed to receive a signed copy of thipment? If yes, was exception report(s) filed? (KAR 28-3) and the first yes, was copy retained for three years? (KAR 28-3) and the first yes, was copy retained for three years?	A)) of a manifest within 45 1-4(f)(4)(B))		Yes Yes Yes Yes	No No No	NA NA
	Do ow Ha a s	es generator retain copy of manifest(s) signed an mer/operator for three years? (KAR 28-31-4(f)(1)(f) is generator ever failed to receive a signed copy of shipment? If yes, was exception report(s) filed? (KAR 28-3)	A)) of a manifest within 45 1-4(f)(4)(B))		Yes /	No No	WA.
	Do ow Ha	es generator retain copy of manifest(s) signed an rer/operator for three years? (KAR 28-31-4(f)(1)(A) s generator ever failed to receive a signed copy of thipment?	A)) of a manifest within 45			NO	G
	Do ow	es generator retain copy of manifest(s) signed an reer/operator for three years? (KAR 28-31-4(f)(1)(/	A))		Yes	No	
C	(KA						
В.	Do	es generator retain a copy of manifest(s) signed to	by both generator and	d transporter?	Yes	No	
_		Name, signature, and date of transporter 2?	Luck and		Yes	No	(NA)
		Name, signature, and date of transporter 1?			Yes	No	ALA
		Generator's certification including waste minimizand date?	zation statement, gen	erator's signature,	Yes	No	
		Special handling instructions?	action etatement son	orator'a signatura	res	NO	_NA
		Unit (weight or volume)?	-		Yes	NA	ATA .
		Total quantity?			Yes	No No	
		Number and type of containers?			Yes		
		Waste Description (DOT shipping name, hazard	ciass, and identificat	ion Number)?	Yes	No No	
		Designated facility's EPA Identification Number?		ion Number\2	Yes	No	
	9.	Name and site address of designated facility?	.		Yes		
	8.	Transporter 2 EPA Identification Number? Name and site address of designated facility?			Yes	No No	
	7.	Transporter 2 Name?			Yes	No	(NA)
	6. 7	Transporter 1 EPA Identification Number?			Yes	No	ANA
	5.	Transporter 1 Name?			Yes	No	
	4.	Generator's phone number?			Yes	No	
	3.	Generator's name and mailing address?			Yes	No	
	2.	Number of pages?			(Ves	No	
		digit)?			Yes	No	NA
,	-	Generator EPA Identification Number (12 digit) a	and manifest docume	nt number (five			
	-31-4	rent manifest showing revision date and burden of c(d)/40 CFR 262.20) es, does manifest(s) include:	disclosure statement	used? (KAR	Yes	No	NA
C.		es, is a copy of the agreement kept for a period o eement?	f three years after ten	mination of	Yes	No (NA
В.		es, is the vehicle used to transport the waste own waste?	ed and operated by t	he reclaimer of	Yes	No	
	If y	es, does the contractural agreement include the t pments?	ype of waste and fred	quency of	Yes	No	
		ntractual agreement used in place of manifesting? (e)(1-2))	(KAR 28-31-4(d)(7)(A	A-C)/40 CFR	Yes	No.	
Mar	lite	ests (GMR)					

Land Disposal Restrictions Requirements (GLB)

IX.	Does facility generate any wastes subject to the land disposal restrictions requirements of 40 CFR 268, Subparts B and C? List these wastes:	Yes No	
	A. Upacos (moto, lotes D.		
	B E		
	C F		
X.	Is the waste(s) covered by a National Variance(s), Extension, or Petition? (40 CFR 268 5&6) A. If yes, describe the variance, extension, or petition which applies:	Yes No)
XI.	Is the waste covered by an exemption? (40 CFR 268.1(c)(2)) A. If yes, does the generator provide a notice with the waste to the T/S/D facility stating that	Yes No	
XII.	the waste is exempt from the land disposal restrictions? (40 CFR 268.7(a)(3)) Does generator ship waste(s) covered by the Land Disposal Restrictions off-site for treatment or disposal? A. If yes, does the generator provide a notification to the T/S/D facility that includes: EPA	Yes No	
	hazardous waste number(s), applicable treatment standards, manifest number(s), and waste analysis data, if available? (40 CFR 268.7)	Yes No	
	B. If yes, is a copy of this notification kept for five years?	Yes No	
XIII.	Does generator treat restricted waste(s) on-site so that they are below the land disposal restrictions standards? (If yes, fill out land disposal restrictions checklist.)	Yes No	
Lai	nd Disposal Restrictions Requirements: Adequate	□ NA	
Pi	re-Transport Requirements (GPT)		,
XIV.	Does generator package waste in accordance with DOT requirements? (KAR 28-31-4(e)(1))	Yes No	NA
XV.	Does generator label (flammable liquid, poison, etc.) each package in accordance with DOT requirements of 49 CFR 172.101 or 172.102? (KAR 28-31-4(e)(2))	Yes No	NA
XVI.	Does generator mark (consignee's or consignor's name and address, etc.) on each package in	6	NIA
	accordance with DOT requirements of 40 CFR 172 Subpart D? (KAR 28-31-4(e)(3)) A. Does generator mark each container of 110 gallons or less as below? (KAR 28-31-4(e)(3))	Yes No	NA NA
	Hazardous Waste – Federal Law Prohibits Improper Disposal.		
	If found, contact the nearest police or public safety authority or the US EPA. Generator's Name and Address		
	Manifest Document Number		
XVII.	Does generator have placards to offer to transporters in accordance with 49 CFR 172 Subpart F? (KAR 28-31-4(e)(4))	Yes No	NA

XVIII. Does generator only use a transporter wh 28-31-4(c)(2))	no is properly registered with the	e department? (KAR	Yes	No	NA
Pre-Transport Requirements:	dequate	☐ Inadequate		□ NA	1
Biennial Reports (GRR)					
XIX. Has generator submitted a biennial repor A. If yes, does generator retain copies for (Note: compare quantities reported on la	or three years? (KAR 28-31-4(f)	(1)(B))	Yes Yes for those y	No No rears.)	NA NA
Biennial Report Requirements:	Adequate	Inadequate			
Special Conditions (GSC	C)				
 XX. Has generator received or transported at (40 CFR Subpart E & F) A. If yes, has generator filed a notice with B. Is waste manifested and signed by a C. If generator transports waste out of the been received? 	ith the Secretary of Health and I	Environment?	Yes Yes Yes Yes	No No No	NA NA
Special Conditions Requirements:	Adequate	☐ Inadequate		∑N	Â
Storage Requirements (XXI. Does generator temporarily store waste A. For 90 days or less? B. For more than 90 days?			Yes Yes Yes	No No No	NA NA
 C. If waste is stored in containers: 1. Are containers marked with the (h)(1)(D)) 2. Is the accumulation start date m 			Yes Yes	No No	NA NA
 (h)(1)(C)) 3. Are all containers holding hazar necessary to add or remove wa 4. Does generator conduct weekly deterioration caused by corrosi 	dous waste closed during stora ste? (KAR 28-31-4(g)(1) or (h)(1) inspections of containers for s	age except when ()(B)) igns of leakage and/or	Yes	No No	NA NA
a. If ves, are these inspections	documented in a log that included actor, notations of observations	les date and time of	Yes	No	N/

		 Are containers holding igniti or reactive waste(s) located at least 15 m (50 feet) from the facility's property line? (EPA Generator and T/S/D Only) (KAR 28-31-4(g)(1) / 40 CFR 265.176) 	Yes	No	NA
		 If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other means? (KAR 28-31-4(g)(1) or (h)(1)(B) / 40 CFR 265.177) Does generator have any satellite storage areas? (KAR 28-31-4(j)) If yes, 	Yes Yes	No No	NA NA
		 a. Is the waste stored in a container at or near the point of generation and under the control of the operator of the process generating the waste? b. Is the container in good condition and closed except to add or remove waste? c. Is the container marked with the words: "Hazardous Waste"? d. Is the container marked with the accumulation start date at the time it becomes full? e. Is the full container moved to the storage area within three days after it became full? 	(B) (B) (B) (E) (E) (E) (E) (E) (E) (E) (E) (E) (E	No No No No No	
		(If waste(s) is placed in tanks, piles, or surface impoundments, complete the appropriate inspection checklist.)			
	orag	e Requirements:			
Sto		Auequate Inladequate		<u></u> N.	A
		sas Generator's Emergency Preparedness (GSQ)		N	Α
K	an	sas Generator's Emergency Preparedness (GSQ)	Yes		<u>a</u>
K	an:		Yes Yes	No No	Α
K	an: Has	sas Generator's Emergency Preparedness (GSQ) facility named one employee as emergency coordinator? (KAR 28-31-4(h)(1)(E)) Is the emergency coordinator available to respond to an emergency by reaching the facility		No No	<u>A</u>
K	Has A. B.	sas Generator's Emergency Preparedness (GSQ) facility named one employee as emergency coordinator? (KAR 28-31-4(h)(1)(E)) Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time? Is the emergency coordinator or his/her designee prepared to respond to any emergencies	Yes	No No	<u>A</u>
Ki XXII.	Has A. B. C.	sas Generator's Emergency Preparedness (GSQ) facility named one employee as emergency coordinator? (KAR 28-31-4(h)(1)(E)) Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time? Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise?	Yes Yes	No No No	<u>A</u>
Ki XXII.	Has A. B. C.	sas Generator's Emergency Preparedness (GSQ) stacility named one employee as emergency coordinator? (KAR 28-31-4(h)(1)(E)) Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time? Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? Is the emergency coordinator familiar with the reporting requirements of KAR 28-31-4(h)(2)? The following information posted next to at least one telephone which is immediately essable in an emergency? (KAR 28-31-4(h)(1)(F))	Yes Yes Yes	No No No	<u>A</u>
Ki XXII.	Has A. B. C.	sas Generator's Emergency Preparedness (GSQ) facility named one employee as emergency coordinator? (KAR 28-31-4(h)(1)(E)) Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time? Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? Is the emergency coordinator familiar with the reporting requirements of KAR 28-31-4(h)(2)? The following information posted next to at least one telephone which is immediately essable in an emergency? (KAR 28-31-4(h)(1)(F)) Name and telephone of emergency coordinator?	Yes Yes	No No No No	<u>A</u>
Ki XXII.	Has A. B. C. Is the ass	sas Generator's Emergency Preparedness (GSQ) stacility named one employee as emergency coordinator? (KAR 28-31-4(h)(1)(E)) Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time? Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? Is the emergency coordinator familiar with the reporting requirements of KAR 28-31-4(h)(2)? The following information posted next to at least one telephone which is immediately essable in an emergency? (KAR 28-31-4(h)(1)(F))	Yes Yes Yes	No No No No	NA
XXIII.	Has A. B. C. Is the ass	sas Generator's Emergency Preparedness (GSQ) is facility named one employee as emergency coordinator? (KAR 28-31-4(h)(1)(E)) Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time? Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? Is the emergency coordinator familiar with the reporting requirements of KAR 28-31-4(h)(2)? The following information posted next to at least one telephone which is immediately essable in an emergency? (KAR 28-31-4(h)(1)(F)) Name and telephone of emergency coordinator? Location of fire extinguishers, fire alarms, or spill control material, if available? Telephone number of fire department unless the facility has a direct alarm? The employees been trained so that they are familiar with proper waste handling and ergency procedures that are relevant to their responsibilities during normal facility	Yes Yes Yes Yes Yes	No No No No	
XXIII.	Has A. B. C. Is that ass	sas Generator's Emergency Preparedness (GSQ) Is facility named one employee as emergency coordinator? (KAR 28-31-4(h)(1)(E)) Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time? Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? Is the emergency coordinator familiar with the reporting requirements of KAR 28-31-4(h)(2)? The following information posted next to at least one telephone which is immediately essable in an emergency? (KAR 28-31-4(h)(1)(F)) Name and telephone of emergency coordinator? Location of fire extinguishers, fire alarms, or spill control material, if available? Telephone number of fire department unless the facility has a direct alarm? We employees been trained so that they are familiar with proper waste handling and	Yes Yes Yes Yes Yes	No No No No	

(If Kansas generator, stop here.)

☐ Adequate

☐ Inadequate

□ NA

Kansas Generator's Emergency Preparedness Requirements:

Preparedness and Prevention (GPT) XXV. If appropriate, based upon the nature and quantity of waste(s) generated and stored at the facility, is the facility equipped with: A. Internal communication or alarm system easily accessable in case of emergency? (KAR Yes No NA 28-31-4(g)(4)/40 CFR 265.32(a)) B. (Telephone or hand-held two-way radio capable of summoning emergency response personnel? (KAR 28-31-4(g)(4)/40 CFR 265.32(b)) NA C. Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment? (KAR 28-31-4(g)(4)/40 CFR 265.32(c)) Yes No NA D. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? (KAR 28-31-4(g)(4)/40 CFR 265.32(d)) Yes No NA E. Is this equipment (A-C above) tested and maintained to ensure its proper operation? (KAR Yes No NA 28-31-4(g)(4)/40 CFR 265.33) XXVI. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? (KAR 28-31-4(g)(4)/40 CFR 265.35) Yes NA XXVII.If appropriate for the type(s) of waste handled, has the owner/operator made the following arrangements: Familiarized the local emergency authorities with the facility, waste(s) handled, entrances and exits? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(1)) Yes No NA B. Designated one authority where one or more police or fire departments might respond to an emergency? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(2)) NA Yes C. Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(3)) Yes NA Familiarized local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility? (KAR Yes NA 28-31-4(g)(4)/40 CFR 265.37(a)(4)) XXVIII.In cases where local authorities decline to enter into such arrangements, is the refusal entered NA in the operating record? (KAR 28-31-4(g)(4)/40 CFR 265.37(b)) Yes No Preparedness and Prevention Requirements: Adequate Inadequate **□** NA Personnel Training (GPT) XXIX. Has the owner/operator established a hazardous waste management training program? (KAR Yes-No 28-31-4(a)(4)/40 CFR 265.16) A. Is the program directed by a person trained in hazardous waste management? (40 CFR Yes No 265.16(a)(2)) B. Are new personnel trained within six months after their employment? (40 CFR 265.16(b)) Yes No C. Are new employees supervised until training is completed? (40 CFR 265.16(b)) No Yes D. After initial training, are employees trained on an annual basis? (40 CFR 265.16(c)) No E. Does the facility maintain the following documents and records: 1. Job title and job description for each position related to hazardous waste No management? (40 CFR 265.16(d)(1)&(2)) 2. Description of type and amount of training to be given each person? (40 CFR No 265.16(d)(3)) Yes 3. Records of training given to facility personnel? (40 CFR 265.16(d)(4)) No

Personnel Training Requirements:

Adequate

Inadequate

Contingency Plan (GPT) XXX. Does the facility have a contingency plan? (KAR 28-31-4(g)(4)/40 CFR 265 Subpart D) A. Does the plan list the name(s), home address, and phone number of designated emergency coordinator(s) in the order in which they should be contacted? (40 CFR No 265.52(d)) B. Is an emergency coordinator available at all times? (40 CFR 265.55) No C. Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? (40 CFR 265.52(a)) No D. Does the plan describe arrangements made with emergency response agencies? (40 CFR No 265.52(c)) E. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? (40 CFR No 265.52(e)) F. Does the plan include an evacuation plan for facility personnel that describes signals and No evacuation routes? (40 CFR 265.52(f)) G. Have copies of the plan been provided to outside emergency response agencies and No hospitals? (40 CFR 265.53) Yes

(If EPA generator, stop here.)

Contingency Plan Requirements:

Adequate

Inadequate

Summary Ashland Chemical Company 3155 Fiberglass Road Kansas City, Kansas EPA Identification Number KSD000203638

On January 5, 1995, the above facility was inspected to determine compliance with State hazardous waste regulations.

The facility continues to operate as a formulator of water treatment chemicals. Refer to previous inspection reports for additional information.

Violations

None noted on day of inspection

Comments/Observations

In 1991 the facility discontinued using the permitted storage area (refer to file for information regarding closure). Hazardous waste is now stored in a designated "less than 90 day" storage area located inside the facility.

On the day of the inspection the generator was storing 23 containers of hazardous waste. Twenty two (22) drums contained off-spec or obsolete water treatment chemical (Sodium hypochlorite D002, D003). The remaining drums contained paint dust/chips (D007, D008) generated from an on-site renovation project.

In 1992 the facility installed a tank farm consisting of one (1) 12,000 gallon and nine (9) 7,500 gallon product storage tanks, and discontinued receiving drummed product for formulation/repacking.

Other changes that have occurred include closing the R & D laboratory (only a small QA/QC lab remains) and the installation of an outside product storage tank located where the insulated railcar storage tanks were previously located.

The facility storage permit will expire in April 1995. The facility has no intention of renewing the permit. A new RCRA Emergency Contingency Plan (CP) will be prepared. The generator was advised KDHE could review the contingency plan prior to distribution to ensure so that it meets State/Federal requirements. The generator was supplied with a sample contingency plan and a 1994 Hazardous Waste Generators Handbook.

JF:gz



ansas Department of Health and Environmer Bureau of Waste Management Forbes Field, Topeka, Kansas 66620-0001 (913) 862-9360

RCRA Compliance Inspection Report T/S/D Facilities Checklist

40 CFR Part 265—Interim Status Standards

General							
General Time A.M. Date January 5 Facility Name Ashland Chemical Company EPAID No. KSD000203638 Street 3155 Fiberglass Road City Kansas City , Kansas Zip 66115 Mailing Address (if different than above) Wyandotte Phone (913 , 621-2410 County Wyandotte Phone (913 , 621-2410 Contact(s) William Dame (Plant Manager) Inspector(s) Jim Fischer Other Activity at Site Treatment Chem/Phys/ Filtration Incineration Recovery Thermal Treatment Sio Treatment Sio Treatment Sio Treatment Other: Storage Orums Pile Surface Impoundment Tank, above ground Other: Disposal Incineration Cher: Impoundment Comments Generator has not used permitted storage area since 1991. Permit will expire in April 1995. Generator does not intend	ry 5, 19						
Facility Name	Ashla	nd Chemical Co	mpany				
Time A.M. Date January 5 Facility Name Ashland Chemical Company EPAID No. KSD000203638 Street 3155 Fiberglass Road City Kansas City , Kansas Zip 66115 Mailing Address (if different than above) County Wyandotte Phone (913 , 621-2410 Contact(s) William Dame (Plant Manager) Inspector(s) Jim Fischer Other Activity at Site Treatment Reprocessing Solvent Recovery Thermal Treatment Other: Storage Pile Surface Impoundment Tank, above ground Trank, above ground Trank, below ground Other: Disposal Incineration Surface Impoundment Surface Impoundment Impoundment Impoundment Surface Impoundment Impoun	115						
Tin Facility Name							
County	Wyand	otte		Phor	913	6212410	
Contact(s)	Willi	am Dame (Plant	Manager)				
Inspector(s)	Jim F	ischer					
Other			-				
2000: 20.00000 : 20.000000 2000 : 20.0 T 20000000	it Site						
Chem/Phys/ Bio Treatr	ment	Reprocessing		Solvent Reco	overy	Thermal Tre	atment
Time A.M. Date January Facility Name Ashland Chemical Company EPAID No. KSD00020363 Street 3155 Fiberglass Road City Kansas City Kansas Zip 66115 Mailing Address (if different than above) County Wyandotte Phone 913 621-2410 Contact(s) William Dame (Plant Manager) Inspector(s) Jim Fischer Other Activity at Site Treatment Reprocessing Solvent Recovery Thermal Treatm Volume Reduction Waste Oil Other: Storage Drums Pile Surface Impoundment Tank, above ground Storage Tank, below ground Other: Disposal Incineration Surface Impoundment Surface Impoundment Manager Comments Generator has not used permitted storage area since 1991.							
	ground			Surface Impo	oundment 	Tank, above	ground
Disposal							
		Landfill		Land Treatm	ent		nent
Comments	Generat	or has not use	d permitt	ed storage	area sin	ice 1991.	
	Permit	will expire in	April 19	95. Gener	ator does	not intend	
	to ren	ew the permit	•				
				The second secon			

Waste Analysis Plan "าด	is)				
1. Does facility maintain a copy or its	waste analysis plan at the facil	ity? (265.13(b))	Yes	No	*********
A. If yes, does the plan include:		4.74		140	
 Parameters for which each has selection of these parameters 	azardous waste will by analyze ? (265.13(b)(1))	d and rationale for the	Yes	. No	
2. Test methods which are used	to test for these parameters?	(265.13(b)(2))	Yes	/ Wo	
Sampling method used to obt		,_,,_,,	YAS	1	
 Frequency with which the inition the analysis is current? (265.1) 	tial analysis will be reviewed or 13(b)(4))	repeated to ensure	Yes	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	
 For off-site facilities, the was (265.13(b)(5)) 	te analyses that generators hav	e agreed to supply?	Yes	No	NA
6. For off-site facilities, the prod movement of hazardous wast the waste designated on the r	e received to ensure that it ma	ect and analyze each tches the identity of	Yes	No	NA
Waste Analysis Plan Requirements:	Adequate	Inadequate			2
Security (DGS)					
II. Does the facility provide either of the	o following:				
A. A 24-hour surveillance system (T)	v monitoring or guards)? (265.1		Yes	No	
B. An artificial or natural barrier (fend control entry (attendant, TV monit access)? (265.14(b)(2))	ce, fence and cliff combination) toring, locked entrance, control	and a means to led roadway	Yes	No	
II. Does the facility provide warning sign	ns at entrances? (265.14(c))		Yes	No	
V. Does the facility consider itself exem		(265.14(a)(1)(2))	Yes	No	
		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		.110	
Security requirements:	Adequate	Inadequate		NA	
General Inspection Require	ments (DGS)		7	\leftarrow	
/. Does the owner/operator maintain a (265.15(b)(1)(2))	written schedule at the facility				
A. Monitoring equipment?			Yes	No	
B. Safety and emergency equipment?			Yes	No	
C. Security devices?			Yes		
D. Operating and structural equipment	?			No	
II. Does the inspection schedule identify		are to be looked for	Yes	No	
during the inspections? $(265.15(b)(3))$			Yes	No	
'III. Does the owner/operator maintain an	inspection log? (265.15(d))		Yes	No	
A. If yes, does the log contain the:					
Date and time of inspection?	P		Yes	No	
 Name of inspector? Notation of observations? 			Yes	No	
 4. Date and nature of repairs or rer 	medial actions		Yes	No	
	Hediai action?		Yes	No	_
Inspection Requirements	Adequate	Inadequate		MA	+)
			1	. 1/	-

P	ersonnel Training (PGS)				77.00	
· IX.	Does the owner/operator mai in at t	he facility the following doc	uments and records		Water-dated	315 (804
*	(203.10)	THE RESERVE ASSESSMENT OF THE PARTY OF THE P		V. C. Albe		
	A. Job title and job description for each management? (265.16(d)(1)(2))			Yes	N)
	B. Description of type and amount of to	raining to be given each per	son? (265.16(d)(3)	Yes	No.	
	C. Records of training given to facility p		FOR TISID	Yes		
Pe	rsonnel Training Requirements:	Adequate Adequate	Inadequate	Λ	A	-
				(0	1	
R	equirements for Ignitable, I	Reactive, or Incor	npatible Wast	es	(DG	S)
X.	Does the facility handle ignitable or read	ctive wastes? (265.17(a))		Yes	No	
	A. If yes, is the waste separated and co sparks, spontaneous ignition, and rad	onfined from sources of ignit	ion or reaction,			
XI.	Are smoking and open flames confined	to specially designated loca	tions? /265 17/e//	Yes	No	
XII.	Are "No Smoking" signs posted in hazar	d areas? (265, 17(a))	1013: (205.17(a))	Yes	No	
XIII.	Does a check of these areas show any		ainers? (265 17/b)(4))	Yes	No	
XIV.	Does a check of these areas show evide	ence of heat generation from		Yes	No	
	incompatible wastes? (265.17(b)(1))	and a mode goneration non	i interaction of	Yes	No	
	table, reactive, or incompatible				. /	
was	ste requirements:	Adequate	Inadequate		X	IA
					$/\sim$	
Pri	eparedness and Prevention	(DPP)		/		
<٧.	Does an inspection of the facility show a contamination? (265.31)	any evidence of fire, explosi	on, or	Yes	No	
۷۱.	If applicable to the facility, is the facility	equipped with:				
	 Internal communication or alarm syste (265.32(a)) 	em easily accessible in case	of emergency?	Yes	No	(NA)
	B. Telephone or hand-held two-way radio personnel? (265,32(b))	capable of summoning em	ergency response		e s	
(VII.	Are portable fire extinguishers, fire contr	ol equipment, spill control e	Guinment and	Yes	No	(NA
	decontamination equipment provided? (26	55.32(c))		Yes	No	(NA
VIII.	Is water of adequate volume provided fo sprinklers, etc.? (265.32(d))	r hose streams, foam produ	cing equipment,	Yes	(
αx.	Is the equipment (mentioned above) tests operation? (265.33)	ed and maintained to ensure	its proper	Yes	No No	MA
X.	Does a check of the facility show sufficient movement of personnel and equipment? (2)	ent aisle space to allow unob	ostructed		,	,
XI.				Yes	No	MA
2311	If appropriate for the type(s) of waste has arrangements with the local emergency a	uthorities to familiarize then	a with the laws of		,	
	facility, properties of wastes handled and personnel normally work, entrances to ro-	associated hazards places	where facility	Yes		

designated authority?	nan one police and ((265.3 (2))	fire department might r	espond, is there one	Yes	Na	(20
XXM. If appropriate for the agreements with state and equipment supplies.	e emergency respon	indled, does the owner/ nse teams, emergency i	operator have response contractors,	Yes		
of injuries that could (265.37(a)(4))	itals with the prope result from fires, ex	rties of hazardous wast splosions, or releases at	e(s) handled and types the facility?	Yes		<u> </u>
XXV. In cases where state refusal entered in the	or local authorities of operating record? (2	decline to enter into suc 65.37(b))	ch arrangements, is the	Yes	No	NA
Preparedness and Prevention	n Requirements:	Adequate	Inadequate		O	7)
				1	7	<i>-</i>
Contingency Plan	and Emerge	ncy Procedure	s (DCP)			
XXVI. Is a contingency plan outside agencies that	may be called upon	to provide emergency	services? (265.53(a)(b)) Yes	No	***************************************
XXVII. Does the plan describ (265.52(c))	e arrangements ma	de with emergency res	ponse personnel?	Yes	No	
XXVIII. Does the plan list the emergency coordinate	e name(s), home add or(s)? (265.52(d))	dress, and phone numb	er of the designated	Yes	No	
XXVIX. Is an emergency coo	rdinator available at	all times? (265.55)		Yes	No	
XXX. Does the plan include physical description of (265.52(e))	a list of all emergen	cv equipment at the fac	ility, its location, a its capabilities?	Yes	No	
XXXI. Does the plan include	an evacuation plan	for facility personnel? (2	265.52(f))	Res	No	×
Contingency Plan and Emerg Procedures Requirements:	ency -	Adequate	☐ Inadequate		N	
F					\nearrow	
Manifest System,	Recordkeepi	ng, and Repor	ting (DMR)			
XXII. Does the facility recei				Yes	No	*********
 A. If yes, does the own signed copy to the tr 	er/operator sign and ansporter? (265.71(a	date each copy of the a)(1-3))	manifest and give a	Yes	No	NA
B. Does the owner/oper30 days of the delive	ator send a signed ory? (265.71(a)(4))	copy of the manifest to	the generator within			
C. Does the owner/oper		f the manifest? (265.71	(a)(5))	Yes Yes	No No	NA NA
XXIII. Does the facility rece						MA
A. If yes, is the shipmer information? (265.71	it accompanied by a	shipping paper contain	ning the appropriate	Yes Yes	No No	NA
 If yes, does the of transporter with a 	wner/operator sign a copy? (265.71(b)(1	and date the shipping p	paper and provide the	Yes	No	NA
2. Does the owner/o		ed copy of the shipping	paper to the			NA
		y of the shipping paper	? (265.71(b)(5))	Yes Yes	No No	NA

×××i∧	'. Ha	as the facility received any shipments of waste that were inconsistent with the anifest? (265.72)	Yes	Ño	
· ~;A	. If	yes, was an attempt ma to reconcile the discrepancy with the generator and ansporter? (265.72(b))			
В		no, was the Regional Administrator notified? (265.72(b))	Yes	No	NA
			Yes	No	NA
A	. If	es the owner/operator keep a written operating record at the facility? (265.73(a)) yes, does the operating record include:	Yes	No	
		A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal? (265.73(b)(1))	Yes	No	NA
	2.	The location of each hazardous waste within the facility and the quantity at each location? (265.73(b)(2))	Yes	No	1.
	3.	Records and result of waste analyses? (265.73(b)(3).	Yes	No	NA NA
		Reports and details of incidents requiring implementation of the contingency plan? (265.73(b)(4))	Yes	No	NA NA
	5.	Records and results of required inspections? (265.73(b)(5))	Vac	N -	
	6.		Yes	No	NA
	7.	Closure cost estimates (and for disposal facilities, post-closure cost estimates)? (265.73(b)(7))	Yes Yes	No No	NA NA
XXXVI.	Ha	s the facility received any waste, which does not fall under the small generator	a 8		
	exc	cusion, not accompanied by a manifest or shipping paper? (265.76)	Yes	No	
Α.	lf y	res, was an unmanifested waste report submitted to the Regional Administrator?	Yes	No	NA
			. 33		7
Manife	est S	ystem, Recordkeeping,			1.
and Re	por	ting Requirements: Adequate Inadequate		Λ	10
				-[0	1
200 <u>1–2</u> 02–200	*********			(
Clos	ure	and Post-Closure (DCL)			
XXXVII. A.	Do If y	es the owner/operator have a written closure plan for the facility? (265.112(a)) es, does the plan include:	Yes	No '	
	1.	A description of how and when the facility will be closed? (265.112(b))			
	2.	A description of the steps necessary to completely close the facility?	Yes	No	
		(265.112(b)(2))	Yes	No	2,1
	3.	An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the facility life? (265.112(b)(3))	Yes	No	ga 1
	4.	A description of the steps needed to decontaminate facility equipment at the time of closure? (265.112(b)(4))	Yes	No .	
		An estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure progress?	Yes	No	
//////////////////////////////////////		(265.112(b)(5)(6)			
	pos	he facility is a disposal facility, does the owner/operator have a written st-closure plan? (265.118(a))	Yes	No (NA
Α.		es, does the plan include:			
	- 1	Ground-water monitoring activities and frequencies at which they will be performed? (265.118(c)(1))	Yes	No (NA
		Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment? (265.118(c)(2))			
		1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	Yes	No /	NIA)

	the post-closure period? 265.11	8(c)(3))	ice to contact during	Yes	No	N
Clo	sure and Post-closure Requirements:	Adequate	Inadequate			TA
•					1	1
Fir	nancial Requirements (DF	FR)				<i>'</i>
XXX	X. Does the owner/operator have a writ	tten estimate of the closure	cost? (265-142(a))	Vaa	N.	
XL.	Has the owner/operator established fine the Regional Administrator? (Required a	ancial assurance for facility		Yes		
XLI.	If the facility is a disposal facility, does the annual cost of post-closure monitor	the owner/operator have a	written estimate of facility? (265, 144(a))	Yes		6
XLII.	Has the owner/operator of the disposal post-closure care and notified the Regio (265.145)	facility established financial	l assurance for d after 7-6-82)	Yes	Ņo	N.
XLIII.	Has the owner/operator obtained liabilit \$1 million with an aggregate of at least (Effective 7-15-82) (265.147(a))	y insurance for sudden occu \$2 million exclusive of lega	urrences of at least	yes	aal No	
XLIV.	If the facility is a disposal facility, has to nonsudden and accident occurrences of annual aggregate of at least \$6 million 7-15-82) (265.147(b))	f at least \$3 million per occu	urrence with an	Yes	No .	NA /
Fina	ncial Requirements:	Adequate	Inadequate		A	W)
					1	
Ma	nagement of Containers	DMC)				
	Are containers presently used to store had a lift no, do not complete questions XLVI			Yes	No	***************************************
В	. If yes, check the condition of contains containers. (265.171 and 265.172)	ers for evidence of incompa	tibility of waste with			
Cond	lition of Containers:	Adequate	Inadequate		×ν.	A
(LVI.	Are all containers holding hazardous was necessary to add or remove waste? (265	ste closed during storage ex .173)	cept when	Yes	No	NA
CLVII.	Does owner/operator inspect areas whe signs of leakage and/or deterioration can	re containers are stored, at	least weekly, for actors? (265.174)	Yes	No	
		asea by corresion of other to				NA
	Are containers holding ignitible or react from the facility's property line? (265.17	ive waste located at least 1	5 meters (50 feet)		No	NA NA
LVIII.	Are containers holding ignitible or react from the facility's property line? (265.17) If waste in containers is incompatible wi containers, piles, open tanks, or surface	ive waste located at least 176) th other materials stored ne	5 meters (50 feet) arby, in other	Yes	No	NA
LVIII.	Are containers holding ignitible or react from the facility's property line? (265.17) If waste in containers is incompatible wi	ive waste located at least 176) th other materials stored ne	5 meters (50 feet) arby, in other		No No	

Note: Determine if owner/operator claims any informine n confidential.

Note: Fill out applicable checklists for specific facility types (i.e., tanks, surface impoundments, piles, land treatment, landfills, groundwater monitoring).

Additional Information	and Conclusions		
		· · · · · · · · · · · · · · · · · · ·	
:			
		* *	

NOTIC

NOTICE (COMPLIANCE/NON-COM

ANCE

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT Division of Environment Waste Management Program

Hazardous Waste: Complaint() LDF() TSF(GENV) KG() SQ() TRA() UOM() UOB() NOT A GEN()	
Solid Waste: Complaint() SLF() TRF() ILF() CDL() HHW() C	OBS() UOS() WTT() WTP() WTM() YWC() MED()	
TO: DShland Comment Go	DIUS195	
3155 Fibrocks Rord	Kensone (+)(5 100115	
Address City	State Zip Code	
HSDCCC263688	Solid Waste Permit No.	
This inspection was conducted to determine compliance with the state and feder	eral solid and hazardous waste statutes and regulations.	
D Violations As Follows	No Violations Identified	
Citation	Description of Violation	
	1 1	
_/ <u>//</u>		
		ìr
Other Comments/Concerns:		: Center
This notice is provided to call immediate attention to those areas of noncompliance. This notice does not constitute a compliance order issued by KDHE and may not be a complete listing of all violations which may be identified as a result of this inspection. Your facility must submit in writing within days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary corrective actions to be taken. Any corrective actions taken by your facility will be considered in subsequent enforcement follow-up.	Your response must be submitted to:	R00006021 RCRA Records Center



JAN 7 5 1955 Hazardous Waste Complianc Monitoring and Enforcement Log

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FORM A

1885				
HANDLER LDF (
ID Number: KSD000203638 HWM	() HWB $()$ UOM $()$ UOB $()$ NOT A GEN $()$			
Handler Name: Ashland Chancel Com	ET OV LIST POPICE !			
Street: 3155 Fbeeglass Pacity:	HANSOS City county: leyandette			
EVALUATION New Followup: Date (on site)	Date (of letter)			
Date 95 07 05 Agency S Type CET	Reason Person JDF District ME			
Areas of Evaluation (EV - Evaluted, NE - Not Evaluated, NA - Not Applicable) Storge ARRA GUSEN				
Generator Transporter	reatment/Storage/Disposal Facility Other			
GER EL GPT EU TGR DCH DCH	DGW / DMC / DPP BRR			
GGR EV GRR EV TMR DCL DCL	DIN JOHN CAS CAS CAS			
GLB EV GSC EV TOR DCP DCP	DLB DOR DTR CSS			
GMR GSQ TRR DFR	DLF DOT DTT FEA			
GOR TWD DGS	DLT DPB DWP ILD ILD			
LITA T	SUM SUB			
Used Oil UOM UOB UTM	SUM SUB			
COMMENTS No loveer storing un	acts our 90 days-ternit Expires 4-95			
CINOTTAKINI ON				
_ M_M _ D _ D _ Z _ Y _ Y _	[M ₁ M ₂ Ch ₁ h ₂ CY ₁ Y ₁]			
VIOLATION # Date Determined	VIOLATION # Date Determined			
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Agency Number Area Class Priority Type	Agency Number Area Class Priority Type			
S				
Regulation Citation:	Regulation Citation:			
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	Description: Returned to Compliance			
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Actual:	Actual:			
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VIOLATION # Date Determined	VIOLATION # Date Determined D			
New Change Delete Comments	New Change Delete Comments *			
Agency Number Area Class Priority Type	Agency Number Area Class Priority Type			
S				
Regulation Citation:	Regulation Citation:			
Description: Returned to Compliance	Description: Returned to Compliance			
Scheduled:	Scheduled:			
Actual	Actual			

Hazardous Waste Compliance Monitoring and Enforcement Log

1D Number: 1500000203638 Handler	Name: ASMAND Chemial Co
VIOLATION # Date Determined	VIOLATION # Date Determined Tyre New Change Delete Comments
New Change Delete Comments Agency Number Area Class Priority Type S	Agency Number Area Class Priority Type S
Regulation Citation: Description: Returned to Compliance	Regulation Citation: Description: Returned to Compliance
Scheduled: Actual: Actual:	Scholate Actual:
VIOLATION # Date Determined	VIOLATION # Date Determined D YY New Change Delete Comments
Agency Number Area Class Priority Type	Agency Number Area Class Priority Type
Regulation Citation: Description: Returned to Compliance	Regulation Citation: Returned to Compliance
Scholuled: Actual:	Scheduled:
VIOLATION # Date Determined Delete Comments	VIOLATION # Date Determined New Change Delete Comments
Agency Number Area Class Priority Type S	Agency Number Area Class Priority Type
Regulation Citation: Description: Returned to Compliance	Regulation Citation: Description: Returned to Compliance
Schooluled: Actual: Actual:	Actual:
ENFORCEMENT New Change	Delete
Date Number Agency S	Type District Person
COVERED VIOLATIONS Agency Violation Number Area Agency Violation Nu S S S S S S S S S S S S S S S S S S	mber Area Agency Violation Number Area S S S S S S S S S S S S S S S S S S
Comments: 10 Violations	



Hazardous Waste Compliance Monitoring and Enforcement Log

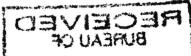
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JAN 8 1992

FORM

AIR and WASTE MANAGENENT

		All the second second		MANAGE	CENT
HANDLER D NUMBER: KSDO	00203631		GEN() VB() UOM()	KG() SQ(UOB() NOT	A GEN ()
HANDLER NAME: Ore	w Industrie	as planel	Theme 1	9-92 RCRIS	1-15-92
STREET: 3155	Filierglass		CITY: Ka	ansas City	
EVALUATION No Date 91 10 29	ew Followup D	CSE	k4/93 on 01 Person L		三 1-6-92
Generator GER EV GPT GRR GRR GLB GSC GSQ GNR GSQ GNR GSQ GNR GSQ	Transporter TGR	Treatment DGW EV DIN EV DLB EV DLF DLT	/Storage/Disposal Facility DMC DMR	DPP	Other CAS
DOMMENTS On	Complian	ie e		RCRA Recor	211 ds Center
VIOLATION # / Dele	Link ete Com	to: VIOL	ATION #	e	Link to:
Agency Number S S S Regulation Citation: KAR Date Determined MM DO W DO W	Returned to Compliance MM Scheduled: 3	S R S Regulati	Number on Citation: Susser Determined DD Y 29991	Returned to Comp Scheduled:	Jan A H
VIOLATION # 3	Link		ATION #	e	Link to: Comments Priority Type
Açency Number S 7 Regulation Citation:	Area Class Priority	5 P S	I 8 I		Priority Type
Date Determined MM DO YY 10 29 9	Returned to Compliance MM D Scheduled: 3 7 Actual: 1 2 7	O YY MM	Determined DO O G G G G G G G G G G G G	Returned to Comp MM Scheduled:	23097



Hazardous Waste Compliance Monitoring and Enforcement Log

FORM

ID Number: Hand	ler Name:		
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VIOLATION # Link to: New Change Delete Comments Agency Number Area Class Priority Type S	VIOLATION # Link to: New Change Delete Comments Agency Number Area Class Priority Type S		
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Agency Number Area Class Priority Type S Pagulation Citation: Date Determined Returned to Compliance MM DO YY Scheduled:	Agency Number Area Class Priority Type S Regulation Citation: Date Determined Returned to Compliance MM DD YY Scheduled:		
Actual: Actual: Actual: Actual: Delete			
Number Agency S COVERED VIOLATIONS Agency Violation Number Area Agency Violation Number S S S S S S S S S S S S S	Link to:		
Comments			



Hazardous Waste Compliance Monitoring and Enforcement Log

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8.65	W .*		Alfrand Y ASTE
HANDLER ID NUMBER: K S D のと	LDF(6) 20 3 63 8 HWM () HWB'(\') UOM'(')	KG () TRA () UOB () NOT A GEN ()
HANDLER NAME: Ore.	Industries Cashland (Thenical) AT NAT 12-10	CL 12-10-91 -41 RCRIS 12107/
STREET: 3/55 £	iluglass	CITY: Ha	nsus City
EVALUATION New	Followup Delete	Verfied in Harans	1-1472/ - 11-26-91
Date 977 70 29 A	gency S Type QEF	Reason Person 4	RR District
Areas of Evaluation (EV - Evalu	ted, NE - Not Evaluated, NA - Not	Applicable)	
GGR GRR C	TGR DCH ME DCL EV TOR DCP EV TRR DFR ME	Treatment/Storage/Disposal Facility DGW WE DMC WE DIN WE DMR EV DLB EV DOR WE DLF WE DOT WE DLT WE DPB WE	DPP WE CAS DSI ME FEA DTR WE DTT WE DWP ME
VIOLATION # _/	Link to:	VIOLATION #	Link to:
Agency Number Are	Class Priority Type	Agency Number A	rea Class Priority Type The Inamus Sec. 4 or permit Returned to Compliance MM DO Y Scheduled: 72 3 9 7 Actual:
VIOLATION # 3	Link to:	VIOLATION # Delete	Link to:
Agency Number Are S D D D D D D D D D D D D D D D D D D D		Agency Number A S Pegulation Citation: KAR	rea Class Priority Type B 2 37-31-14
Date Determined	Returned to Compliance	Date Determined	Returned to Compliance
MM DO YY 102991	Scheduled: MM DD YY Actual: MM DD YY	MM DD W 102991	Scheduled: 123091 Actual:

Hazardous Waste Compliance Monitoring and Enforcement Log

FORM B

ID Number: Hand	ller Name:
VIOLATION # Link to: New Change Delete Comments	VIOLATION # Link to: New Change Delete Comments
Agency Number Area Class Priority Type S Pegulation Citation:	Agency Number Area Class Priority Type S
Date Determined Returned to Compliance	Date Determined Returned to Compliance
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VIOLATION # Link to: New Change Delete Comments	VIOLATION # Link to: New Change Delete Comments
Agency Number Area Class Priority Type S	Agency Number Area Class Priority Type S
Date Determined Returned to Compliance	Date Determined Returned to Compliance
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VIOLATION # Link to: New Change Delete Comments	VIOLATION # Link to: New Change Delete Comments
Agency Number Area Class Priority Type S	Agency Number Area Class Priority Type S
Date Determined Returned to Compliance	Date Determined Returned to Compliance
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ENFORCEMENT New Change D	elete
YY MM DD	Type 120 District WE Person LLR
COVERED VIOLATIONS	Link to:
Agency Violation Number Area Agency Violation Number S S S S S S S S S S S S S S S S S S S	
Comments:	